



James W. Perkins, Esq.  
(212) 801-3188  
perkinsj@gtlaw.com

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: 4/28/11  
DATE FILED: 4/28/11

April 8, 2011

**VIA FACSIMILE**

Honorable Victor Marrero  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Suite 660  
New York, New York 10007

Re: *Hausler v. JP Morgan Chase Bank, N.A., et al.*  
**09 Civ. 10289 (VM)**

Dear Judge Marrero:

We are counsel to the Petitioner in the above-referenced proceedings and, in follow up to the Court telephone conference held Wednesday April 6, 2011, write to advise of the briefing schedule to which the parties have agreed, and to seek Court approval of that schedule.

Moving papers: filed by no later than April 15, 2011

Opposing/cross moving papers: filed by no later than May 18, 2011

Reply/Opposing papers: filed by no later than June 3, 2011

Reply on cross-motions: filed by no later than June 17, 2011

As mentioned during the conference call, Petitioner intends to make three separate motions for judgment on the pleadings/summary judgment: (1) balance of Tranche I (Shanghai Pudong Bank); (2) Tranche III; and (b) National Bank of Canada Petition. Each motion will include a moving brief of no more than 15 pages, none of which will repeat, but will cross-reference arguments when possible. Opposing briefs/cross-moving briefs will be no more than 25 pages (if combined with all respondents per motion) or 15 pages (if not combined in a single response per motion) and reply briefs will be no more than 10 pages. As the Court directed, arguments previously made by any party may be raised and preserved by cross-reference or incorporation by footnote or otherwise.

Honorable Victor Marrero  
April 8, 2011  
Page 2

On behalf of all counsel for the parties, we respectfully request that the Court approve this schedule and procedure.

Respectfully submitted,



James W. Perkins

cc: James L. Kerr, Esq. (by e-mail)  
Ramin Afshar-Mohajer, Esq. (by e-mail)  
David A. Baron, Esq. (by e-mail)  
Kenneth Caruso, Esq. (by e-mail)  
Robert N. Dunn, Esq. (by e-mail)  
Lauren Beck Kerwin, Esq. (by e-mail)  
Ronald Kleinman, Esq. (by e-mail)  
Glenn Kurtz, Esq. (by e-mail)  
Paulo Lima, Esq. (by e-mail)  
Alfonso Perez, Esq. (by e-mail)  
Wilfredo Rodriguez, Esq. (by e-mail)  
Joanne W. Young, Esq. (by e-mail)

